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FILED (DROP BOX)

MAR 03 2021

AT SEATTLE
CLERK U.S. DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON DEPUTY
BY

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

Ismail Ahmed

Plaintiff(s).

King County

Defendant(s)

CASE NO. 2:21-cv-00279 RAJ
[to be filled in by Clerk's Office]

COMPLAINT FOR A CIVIL CASE

Jury Trial: Yes No

J. THE PARTIES TO THIS COMPLAINT

A. Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name _____

King County Juvenile

Street Address

1211 E Alder St

City and County

Seattle, Ky

State and Zip Code

Washington 98122

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1 B. Defendant(s)

2 Provide the information below for each defendant named in the complaint, whether the
 3 defendant is an individual, a government agency, an organization, or a corporation. For an
 4 individual defendant, include the person's job or title (if known). Attach additional pages if
 5 needed.

6 Defendant No. 1

7 Name

Allen Nance

8 Job or Title (if known)

Director

9 Street Address

1211 E Alder St

City and County

Seattle King

State and Zip Code

Washington 98122

Telephone Number

206-205-9500

10 Defendant No. 2

11 Name

Lisa Hynes Davis

12 Job or Title (if known)

Chief

13 Street Address

1211 E Alder St

14 City and County

Seattle King

15 State and Zip Code

Washington 98122

16 Telephone Number

206-205-9500

17 Defendant No. 3

18 Name

19 Job or Title (if known)

20 Street Address

21 City and County

22 State and Zip Code

23 Telephone Number

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1 Defendant No. 4

2 Name _____

3 Job or Title (*if known*) _____

4 Street Address _____

5 City and County _____

6 State and Zip Code _____

7 Telephone Number _____

II. BASIS FOR JURISDICTION

9 Federal courts are courts of limited jurisdiction (limited power). Generally, only two
10 types of cases can be heard in federal court: cases involving a federal question and cases
11 involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under
12 the United States Constitution or federal laws or treaties is a federal question case. Under 28
13 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and
14 the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of
15 citizenship case, no defendant may be a citizen of the same State as any plaintiff.

16 What is the basis for federal court jurisdiction? (*check all that apply*)

17 Federal question Diversity of citizenship

18 Fill out the paragraphs in this section that apply to this case.

19 A. If the Basis for Jurisdiction Is a Federal Question

20 List the specific federal statutes, federal treaties, and/or provisions of the United States
21 Constitution that are at issue in this case.

22 Freedom of speech 1st Amendment. Wrote
23 a staff report about workplace
24 targetting and got immediately terminated.

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1 B. If the Basis for Jurisdiction Is Diversity of Citizenship

2 1. The Plaintiff(s)

3 a. If the plaintiff is an individual.

4 The plaintiff (name) Ismail Ahmed, is a citizen of the

5 State of (name) Washington.

6 b. If the plaintiff is a corporation.

7 The plaintiff, (name) _____, is incorporated under

8 the laws of the State of (name) _____, is incorporated under

9 the laws of the State of (name) _____, and has its principal

10 place of business in the State of (name) _____.

11 *(If more than one plaintiff is named in the complaint, attach an additional page providing
the same information for each additional plaintiff.)*

13 2. The Defendant(s)

14 a. If the defendant is an individual.

15 The defendant, (name) Allen Nance, is a citizen of the

16 State of (name) Washington. Or is a citizen of

17 (foreign nation) _____.

18 b. If the defendant is a corporation.

19 The defendant, (name) Lisa Hynes Davis, is incorporated under

20 the laws of the State of (name) Washington, and has its principal

21 place of business in the State of (name) _____.

22 Or is incorporated under the laws of (foreign nation) _____,

23 and has its principal place of business in (name) _____.

24 *(If more than one defendant is named in the complaint, attach an additional page
providing the same information for each additional defendant.)*

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1 3. The Amount in Controversy.

2 The amount in controversy-the amount the plaintiff claims the defendant owes or the
3 amount at stake-is more than \$75,000, not counting interest and costs of court, because (*explain*):

4 _____
5 _____
6 _____

7 **III. STATEMENT OF CLAIM**

8 Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as
9 possible the facts showing that each plaintiff is entitled to the damages or other relief sought.
10 State how each defendant was involved and what each defendant did that caused the plaintiff
11 harm or violated the plaintiff's rights, including the dates and places of that involvement or
conduct. If more than one claim is asserted, number each claim and write a short and plain
statement of each claim in a separate paragraph. Attach additional pages if needed.

12 Wrote a Staff report of several dates
13 about being targeted by Management and
14 WCS immediately terminated.

15 **IV. RELIEF**

16 State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do
17 not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing
18 at the present time. Include the amounts of any actual damages claimed for the acts alleged and
the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts,
and the reasons you claim you are entitled to actual or punitive money damages.

19 \$25,000 for workplace retaliation.
20 \$15,000 lost salary. \$10,000 emotional
21 stress.

22 **V. CERTIFICATION AND CLOSING**

23 Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my
24 knowledge, information, and belief that this complaint: (1) is not being presented for an improper

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1 purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation;
2 (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or
3 reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so
4 identified, will likely have evidentiary support after a reasonable opportunity for further
5 investigation or discovery; and (4) the complaint otherwise complies with the requirements of
6 Rule 11.

7 I agree to provide the Clerk's Office with any changes to my address where case-related
8 papers may be served. I understand that my failure to keep a current address on file with the
9 Clerk's Office may result in the dismissal of my case.

10 Date of signing: 3/1/21

11 Signature of Plaintiff 

12 Printed Name of Plaintiff Ismail Ahmed

14 Date of signing: _____

15 Signature of Plaintiff _____

16 Printed Name of Plaintiff _____

18 Date of signing: _____

19 Signature of Plaintiff _____

20 Printed Name of Plaintiff _____

Film vs King County

Defendant's listed are
witnesses and I want
to subpoena them
as process server
or

Plaintiff King County
Defendant

Ahmed

Ismael